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Attorney for Defendant
BALMORE HERNANDEZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BALMORE HERNANDEZ,

Defendant.

Case No. CR 20-00353-WHO

STIPULATION AND
[PROPOSED] ORDER CONTINUING
STATUS HEARING RE SENTENCING

On September 16, 2020, the defendant was charged by Information with one count of Conspiracy to Commit Honest Services Wire Fraud, in violation of Title 18, United States Code, Sections 1343, 1346 and 1349. On October 8, 2020, the defendant pleaded guilty pursuant to a cooperation plea agreement. His cooperation is ongoing.

As part of the plea agreement, the defendant agreed to request continuances of his sentencing date, as necessary, until his cooperation is completed. A status hearing on the defendant's sentencing is currently set for January 12, 2023. Because defendant's cooperation is still pending, the parties respectfully request to continue the current status hearing to April 6, 2023 at 1:30 PM.

SO STIPULATED.

1 DATED: January 9, 2023

STEPHANIE M. HINDS
Acting United States Attorney

2
3 /s/
DAVID WARD
4 Assistant United States Attorney

5 DATED: January 9, 2023

6 /s/
JULIA JAYNE
7 JAYNE LAW GROUP, P.C.
8 Counsel for Defendant

9 **[PROPOSED] ORDER**

10 Pursuant to stipulation, the status hearing regarding sentencing currently set for January
11 12, 2023 in the above-captioned matter will be continued to April 6, 2023 at 1:30 PM.

12
13 SO ORDERED.

14
15 DATED: _____

16 HON. WILLIAM H. ORRICK
United States District Court Judge